

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

NOTICE OF MOTION

Plaintiff, Case No. 1:25-cv-00118
-against- (PLM)(PJG)

LINDA A. ALLEN as Trustee for GOLDEN ASSETS
SETTLEMENT TRUST and Individually; BERRIEN
COUNTY, MI; and ST. JOSEPH CHARTER TOWNSHIP,
BERRIEN COUNTY, MI,

Hon. Paul L. Maloney

Defendants.

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PLEASE TAKE NOTICE that upon all the pleadings and proceedings heretofore had herein, and Defendant Berrien County's Memorandum of Law in Support of Its Motion to Dismiss, dated March 18, 2025, Berrien County moves this Court before the Honorable Paul L. Maloney, United States District Judge, Western District of Michigan, at the Courthouse thereof, 699 Federal Building, Grand Rapids, MI, for an order dismissing the action as against Berrien County pursuant to Fed. R. Civ. P. 12(b)(6) on the grounds that the Complaint filed by the United States of America fails to state a claim against Berrien County upon which relief can be granted.

Dated: St. Joseph, Michigan
March 18, 2025

/s/ Thaddeus J. Hackworth
Thaddeus J. Hackworth (P84996)
Berrien County Corporate Counsel
701 Main Street
St. Joseph, MI 49085
(269) 983-7111 x8416
hackworth@berriencounty.org
Attorney for Berrien County

TO: Danielle Sumner
U.S. Department of Justice, Civil Tax Division
Ben Franklin Station
P.O. Box 55
Washington, DC 20044

Linda A. Allen-Bey, *pro se*
1619 Lyola Ct
Benton Harbor, MI 49022